

**REMARKS*****Claim Rejections Under 35 U.S.C. § 103***

Claims 9-14 and 24-26 were rejected under 35 U.S.C. § 103(a) as being anticipated over McConnell et al. (U.S. Patent No. 5,986,952) in view of Barth, Jr., et al. (U.S. Patent No. 5,134,616). Applicant traverses this rejection.

As Applicant has already pointed out in its previous responses, McConnell et al. is explicit in its reliance on a redundancy detection device 4 and a repair device 5, and always uses redundancy in its structure. On the other hand, the specification of the present invention, which must be consulted to determine the scope of the claims in the application, explicitly discusses operation without the need for a repair device. The error correction circuitry is built right into the memory device, in an on-chip fashion, therefore eliminating the need for a microprocessor or external hardware to perform detection and correction. No embodiment of McConnell is without the redundancy and external hardware/processor for doing the actual work that is performed on-chip in the present claims. Despite the Office Action's insistence that McConnell et al. reads on the claim, there is no evidence to support McConnell ever operating without a repair device. In fact, if there were no repair device such as device 5 in McConnell et al., McConnell et al. would provide a non-functional unit.

The on-chip ECC eliminates the need for the redundancy devices of McConnell et al., and renders them useless. This substantially alters the principle of operation of McConnell et al., and explicitly teaches away from the stated objects of McConnell et al., as stated in its summary: "It is accordingly an object of the invention to provide a redundancy concept for memory circuits ..." See McConnell et al., col. 1, ll. 54-55.

Barth, Jr., et al. is cited for adding on-chip ECC. However, as has been clearly shown above, the addition of on-chip ECC would substantially alter the principle of operation of McConnell et al. by removing its redundancy scheme, a scheme that is required in each and every embodiment of McConnell et al. It is not sufficient to find the elements of a claim in multiple references. There must be a motivation or suggestion to combine those references. When a secondary reference (in this case Barth, Jr., et al.) would render the prior art unsatisfactory for its intended purpose (as here, the provision of a redundancy scheme), or would change the principle of operation of the main reference, a rejection for obviousness is not proper (see MPEP 2143.01). As such, there is no motivation or suggestion to combine the references, and even if such a combination were allowable, it would not result in the present claimed subject

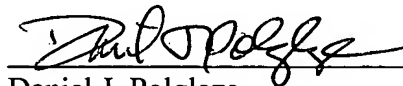
matter. Neither McConnell et al., nor Barth, Jr., et al., nor any combination thereof, renders the present claims obvious.

Claims 9, 10, 24, and 26 each have similar recitation, and are allowable for the reasons set forth above. The remaining claims are dependent on and further define one of patentably distinct claims 9, 10, or 24, and are also believed allowable.

**CONCLUSION**

Applicant respectfully submits that the claims are allowable, and requests withdrawal of the rejections, and the issuance of a notice of allowance. If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2203.

Respectfully submitted,

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